

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on April 17, 2012.

Permit Number: **R30-10700001-2012**
Application Received: **August 31, 2012**
Plant Identification Number: **03-54-10700001**
Permittee: **E. I. duPont de Nemours and Company**
Facility Name: **Washington Works**
Business Unit: **Waste Water Treatment Plant (Part 10 of 14)**
Mailing Address: **P.O. Box 1217, Washington, WV 26181-1217**

Permit Action Number: MM01 Revised: March 29, 2013

Physical Location:	Washington, Wood County, West Virginia
UTM Coordinates:	442.3767 km Easting • 4,346.8331 km Northing • Zone 17
Directions:	Route 68 west from Parkersburg to intersection of Route 892. Continue west on Route 892 with the plant being on the north side about one mile from the intersection of Routes 68 and 892.

Facility Description

DuPont Washington Works is a multiple business, multiple product line facility that produces plastic and resins and their associated feedstock materials. Power and Services manages and operates the plant infrastructure to support the operating business units. As part of these operations Power and Services operates both gas and coal fired boilers to produce steam for on-site use. Power and Services personnel also operate an industrial wastewater treatment facility, a sanitary wastewater treatment facility, an air compressor system to supply plant air, and a water treatment facility to supply treated water for both process uses and sanitary uses on-site.

Emissions Summary

As a result of this modification, the facility will have the following change in emissions:

Formaldehyde	- 0.17 TPY
Methanol	- 338.26 TPY
Total HAPs	- 319.56 TPY
VOCs	- 31.32 TPY
Dimethyl Formamide	- 2.32 TPY

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of an individual HAP, and over 25 tons per year aggregate HAPs. Therefore, DuPont Washington Works is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Permits for construction, modification, relocation, etc.
	45CSR30	Operating permit requirement.
State Only:	N/A	

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2654B	01/11/2013	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

Changes made to the Title V Permit as part of this minor modification are summarized below:

1. R13-2654B Changes
 - A) The emission limits in Condition 8.1.2 have been reduced.
 - B) Due to a new feed composition, Dimethyl Formamide has been removed and Toluene has been introduced. This has been reflected in Condition 8.1.3.
 - C) Condition 8.1.4, which is the Formaldehyde concentration limit at the inlet of the WWTP, has been removed. Concentration of the inlet is only the factor for the dilution rate of the stream; a more practical means of emissions limitation is the pounds/hour emission rate of the formaldehyde. This takes into account other facility factors affecting emission rates - temperature, aeration, and biodegradation. The EPA WATER9 model allows the input of these factors into the modeling to give a realistic emission rate for specific components known to be in the feed matrix. The remaining conditions in Section 8.1 have been renumbered accordingly.
 - D) Condition 8.3.1 will now show compliance with the hourly and annual emission limits for Formaldehyde in Condition 8.1.2 instead of the now deleted concentration limits of 8.1.4.
 - E) The requirement to send weekly samples to an outside laboratory to analyze formaldehyde concentration has been removed from Condition 8.3.2. The formaldehyde testing equipment and method specified in Condition 8.3.1 is sufficient to show compliance with the formaldehyde emission limits.
 - F) An addendum to Condition 8.4.3 states that one missing weekly sample per 30-day period of Methanol data will not be considered a deviation. This makes this Condition consistent with Condition 8.4.2.c.
 - G) The citation listed in renumbered Condition 8.1.4 has been corrected.
 - H) The R13-2654B Permit revised the recordkeeping for each tested species from total organic compounds to methanol. This has been reflected in Condition 8.4.2.a.
 - I) Two units (P209 Deaeration Tank and P210 Clarifier Tank) have been added to the table in Condition 8.4.2. These units have always been in the R13-2654 Permit, and should have been included in the previous issuance.
2. Other Changes
 - A) Two Cooling Towers (P203 and P204) have been removed from Appendix D in this Permit.
 - B) The ash storage pile (P999) has been removed from the Emissions Unit Table. The Permittee notified the agency on October 20, 2012 of its removal and this was acknowledged by DAQ via email on October 22, 2012.

Non-Applicability Determinations

1. Greenhouse Gas Tailoring Rule

This modification did not trigger a PSD permit. As such, there are no applicable GHG permitting requirements.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: N/A
Ending Date: N/A

All written comments should be addressed to the following individual and office:

Mike Egnor
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Mike Egnor
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1208 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.